

AF/3624\$

## FEE TRANSMITTAL FOR FY 2002

**TOTAL AMOUNT OF PAYMENT (\$)** \$320.00

**Complete if Known:**

Application No. 09/183,282

Filing Date October 30, 1998

First Named Inventor Shah-Nazaroff et al

Group Art Unit 3624

Examiner Name \_\_\_\_\_

Attorney Docket No. 42390P6489

**METHOD OF PAYMENT** (check one)

1.  The Commissioner is hereby authorized to charge indicated fees and credit any over payments to:

Deposit Account Number 02-2666

Deposit Account Name Blakely, Sokoloff, Taylor & Zafman, LLP

- Charge Any Additional Fee Required Under 37 CFR 1.16 and 1.17 FIRST CLASS CERTIFICATE OF MAILING  
(37 C.F.R. § 1.8 (a))

- Applicant claims small entity status. See 37 CFR 1.27

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to the Assistant Commissioner for Patents, Washington, DC 20231.

2.  Payment Enclosed:  Check  
\_\_\_\_\_  
 Money Order  
\_\_\_\_\_  
 Other

**FEE CALCULATION**

1. **BASIC FILING FEE**

Large Entity	Small Entity	Fee Description	Fee Paid
Fee	Fee	Fee	
Code	(\$)	Code	(\$)
1001	740	2001	370
1002	330	2002	165
1003	510	2003	255
1004	740	2004	370
1005	160	2005	80
		Utility application filing fee	
		Design application filing fee	
		Plant filing fee	
		Reissue filing fee	
		Provisional application filing fee	

SUBTOTAL (1) \$ 0.00

2. **EXTRA CLAIM FEES**

		Extra Claims	Fee from below	Fee Paid
Total Claims		- 20** =		X =
Independent Claims		- 3** =		X =
Multiple Dependent				=

\*\*Or number previously paid, if greater; For Reissues, see below.

Large Entity Small Entity

Fee	Fee	Fee	Fee	Fee Description
Code	(\$)	Code	(\$)	
1202	18	2202	9	Claims in excess of 20
1201	84	2201	42	Independent claims in excess of 3
1203	280	2203	140	Multiple dependent claim, if not paid
1204	84	2204	42	**Reissue independent claims over original patent
1205	18	2205	9	**Reissue claims in excess of 20 and over original patent

SUBTOTAL (2) \$ 0.00

Attorney Docket No.: 42390P6489

Application No.: 09/183,282

RECEIVED  
OCT 15 2002  
GROUP 3600

October 2, 2002  
Krista Matheson  
Name of Person Mailing Correspondence  
Signature  
Date

**FEE CALCULATION (continued)**

**3. ADDITIONAL FEES**

<b>Large Entity</b>		<b>Small Entity</b>			
<b>Fee</b>	<b>Fee</b>	<b>Fee</b>	<b>Fee</b>	<b>Fee Description</b>	<b>Fee Paid</b>
<b>Code</b>	<b>(\$)</b>	<b>Code</b>	<b>(\$)</b>		
1051	130	2051	65	Surcharge - late filing fee or oath	
1052	50	2052	25	Surcharge - late provisional filing fee or cover sheet	
1053	130	1053	130	Non-English specification	
1812	2,520	1812	2,520	For filing a request for ex parte reexamination	
1813	8,800	1813	8,800	Request for inter parties reexamination	
1804	920*	1804	920*	Requesting publication of SIR prior to Examiner action	
1805	1,840*	1805	1,840*	Requesting publication of SIR after Examiner action	
1251	110	2251	55	Extension for reply within first month	
1252	400	2252	200	Extension for reply within second month	
1253	920	2253	460	Extension for reply within third month	
1254	1,440	2254	720	Extension for reply within fourth month	
1255	1,960	2255	980	Extension for reply within fifth month	
1401	320	2401	160	Notice of Appeal	
1402	320	2402	160	Filing a brief in support of an appeal	\$320.00
1403	280	2403	140	Request for oral hearing	
1451	1,510	1451	1,510	Petition to institute a public use proceeding	
1452	110	2452	55	Petition to revive – unavoidable	
1453	1,280	2453	640	Petition to revive - unintentional	
1501	1,280	2501	640	Utility issue fee (or reissue)	
1502	460	2502	230	Design issue fee	
1503	620	2503	310	Plant issue fee	
1460	130	1460	130	Petitions to the Commissioner	
1807	50	1807	50	Processing fee under 37 CFR 1.17(q)	
1806	180	1806	180	Submission of Information Disclosure Stmt	
8021	40	8021	40	Recording each patent assignment per property (times number of properties)	
1809	740	2809	370	For filing a submission after final rejection (see 37 CFR 1.129(a))	
1814	110	2814	55	Statutory Disclaimer	
1810	740	2810	370	For each additional invention to be examined (see 37 CFR 1.129(b))	
1801	740	2801	370	Request for Continued Examination (RCE)	
1802	900	1802	900	Request for expedited examination of a design application	
1504	300	1504	300	Publication fee for early, voluntary, or normal pub.	
1505	300	1505	300	Publication fee for republication	
1803	130	1803	130	Request for voluntary publication or republication	
1808	130	1808	130	Processing fee under 37 CFR 1.17(i) (except provisionals)	
1454	1,280	1454	1,280	Acceptance of unintentionally delayed claim for priority	

Other fee (specify) \_\_\_\_\_

Other fee (specify) \_\_\_\_\_

**SUBTOTAL (3) \$ 320.00**

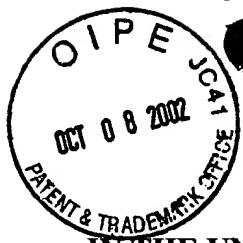
\*Reduced by Basic Filing Fee Paid

**SUBMITTED BY:**

Typed or Printed Name: Melissa A. Haapala

Signature: Melissa A. Haapala Date: October 2, 2002

Reg. Number: 47,622 Telephone Number: (303) 740-1980



#20 w  
10-17-02

Patent

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re the Patent Application of: )  
Shah-Nazaroff et al. )  
Serial No.: 09/183,282 ) Art Unit: 2172  
Filed: October 30, 1998 )  
For: METHOD AND APPARATUS FOR SEARCHING ) Examiner: Colbert, E.  
THROUGH AN ELECTRONIC PROGRAMMING )  
GUIDE )  
\_\_\_\_\_  
)

Honorable Commissioner of  
Patents and Trademarks  
Washington, D.C. 20231

RECEIVED  
OCT 15 2002  
GROUP 3600

APPEAL BRIEF  
IN SUPPORT OF APPELLANT'S APPEAL  
TO THE BOARD OF PATENT APPEALS AND INTERFERENCES

Sir:

Applicants (hereafter "Appellant") hereby submits this Brief in triplicate in support of its appeal from a final decision by the Examiner, mailed May 6, 2002 in the above-captioned case. Appellant respectfully requests consideration of this appeal by the Board of Patent Appeals and Interferences for allowance of the above-captioned patent application.

An oral hearing is not desired.

FIRST CLASS CERTIFICATE OF MAILING

(37 C.F.R. § 1.8 (a))

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to the Assistant Commissioner for Patents, Washington, DC 20231.

October 2, 2002  
Krista Mathison

Name of Person Mailing Correspondence

Signature

Date

## TABLE OF CONTENTS

I.	REAL PARTY IN INTEREST.....	3
II.	RELATED APPEALS AND INTERFERENCES.....	3
III.	STATUS OF THE CLAIMS.....	3
IV.	STATUS OF AMENDMENTS.....	3
V.	SUMMARY OF THE INVENTION.....	4
VI.	ISSUES PRESENTED.....	7
VII.	GROUPING OF CLAIMS.....	7
VIII.	ARGUMENT.....	8
X.	APPENDIX OF CLAIMS.....	i

**I. REAL PARTY IN INTEREST**

The invention is assigned to Intel Corporation of 2200 Mission College Boulevard, Santa Clara, California 95052-8119.

**II. RELATED APPEALS AND INTERFERENCES**

To the best of Appellant's knowledge, there are no appeals or interferences related to the present appeal that will directly affect, be directly affected by, or have a bearing on the Board's decision.

**III. STATUS OF THE CLAIMS**

Claims 1-33 are currently pending in the above-referenced application. No claims have been allowed. Claims 1-33 were rejected in the Final Office Action mailed May 6, 2002, and are the subject of this appeal.

The specification stands rejected under 35 U.S.C. § 132. Claims 1-33 stand rejected under 35 U.S.C. § 103(a).

**IV. STATUS OF AMENDMENTS**

No amendments were submitted in response to the Final Office Action mailed on May 6, 2002, rejecting claims 1-33. A copy of all claims on appeal is attached hereto as Appendix A.

## V. SUMMARY OF THE INVENTION

Present cable and satellite television services can provide more than one hundred different entertainment channels for immediate viewing. For any one person, the choices can be increased further by including a personal video and music library. With so many choices, it can be difficult to find what one is looking for.

The electronic program guide (EPG) has been developed as the solution to distributing an accurate guide and also helping the viewer find an entertainment program. The conventional EPG allows the viewer to scroll vertically through channels, usually in numerical order and to scroll horizontally across time slots into future and past programs. In more advanced EPGs, the viewer can restrict the display to certain categories (e.g. sports, movies, news, children etc.). Systems have also been proposed which allow the viewer to conduct a search of the EPG for letters or words in the titles of programs.

The present invention goes beyond title searches to provide viewers with a faster, easier, and more powerful way to find programs even when the channel, time slot, and title are not known. It does so by using selectable identifiers. The specification provides an example of the invention using the movie *The Fugitive* starring Harrison Ford. Briefly, in this example, the present invention allows a viewer to select, for example, a current playing or future playing movie or television title (See Fig. 6). Upon selecting *The Fugitive*, a short synopsis of the movie along with its main actors, rating, and genre is displayed (See Fig. 7). This display includes three selectable identifiers 711, 712, and 713. By selecting the one for Harrison Ford (712), the system searches a plurality of sources of information for all of the programs starring Harrison Ford. The results of the search are displayed in a second display area (See Fig. 8). (See Application page 18 line 16 – page 19 line 13 and Figure 10).

Claim 1 is directed to a method for managing entertainment system data. It does so by first “obtaining a record corresponding to a first entertainment selection,” in the previous example, this would be the general listing of shows, times, and channels, from

which a viewer might initially select The Fugitive for more information. (See Application page 15 lines 21-27 – page 16 lines 1-7). Once The Fugitive has been selected, its information - movie synopsis, main actors, rating, and genre - is displayed on a display device, corresponding to “presenting a first set of entertainment system data in the obtained record corresponding to the first entertainment selection on a display device” in claim 1. (See Application page 16 lines 12-18 and Figure 7). This display of information about The Fugitive will contain at least one “selectable identifier corresponding to the first set of entertainment system data on the display device.” (See Application page 16 lines 17-24 and Figure 7 reference nos. 711-713). Now if, for example, the viewer wishes to see what other movies are playing or going to be played starring Harrison Ford, she can select “Harrison Ford” (selectable identifier 712 in Figure 7) which corresponds to “receiving a selection of the selectable identifier.” “Instructions linked to the selectable identifier” will then be accessed (See Application page 13, lines 16-22, and page 15, lines 3-6) and a search will be performed “based on the accessed instructions for a second entertainment selection having a corresponding second set of entertainment system data related to the first set of entertainment system data....” (See Application page 17 lines 3-12 and Figure 8 reference no. 720). Finally, the result of this search will be presented on the display device as shown in Figure 8.

Claim 6, is a Beauregard claim based on claim 1.

Claim 11 is directed to a system control agent that comprises a data parser, a data engine, and a query interface. (See Figure 3). The system control agent 310 receives entertainment system data from a plurality of sources. (See Application page 10 line 8-page 11 line 12). This data is then formatted by the data parser “into an identifier portion and a data portion.” (See Application page 11 line 13 - page 12 line 9). The formatted entertainment system data is then sent to “a data engine, coupled to the data parser, that stores the entertainment system data into a database according to corresponding entertainment selections.” (See Application page 12 lines 10-24 and Figure 4). Once the

data is stored, it can be made accessible to the viewer. This is done through “a query interface, coupled to the database, that configures a graphical user interface (GUI) having an identifier corresponding to a first set of entertainment system data of a first entertainment selection, the identifier being selectable to cause the query interface to execute instructions linked to the identifier that require a search to be performed in the data engine and to display a second entertainment selection having a corresponding second set of entertainment system data related to the first set of entertainment system data,” the result of which is shown in Figures 6, 7, and 8. (See Application page 12 line 25 – page 13 line 22).

Claim 12 is dependent on claim 11 and describes the claimed query interface. It is composed of a user interface unit, a database interface unit, and a synopsis box building unit. (See Figure 9 reference nos. 910, 920, and 930). The user interface unit “receives an identity of the identifier selected” by communicating with the wireless communication interface unit (See Figure 2 reference no. 234) according to an embodiment of the present invention. (See Application page 17 lines 16-21). The database interface unit is “coupled to the user interface” and it receives an identity of the selectable identifier that was selected by the viewer (Harrison Ford in our example) and “searches the database for the second entertainment selection having the corresponding second set of entertainment system data related to the first set of entertainment system data.” (See Application page 17 lines 22-26). Once the search is complete, the data is sent to a synopsis box building unit that is “coupled to the database interface unit” and “displays the identity of the second entertainment selection on a display device” as shown in Figure 8. (See Application page 18 lines 1-15 and Figures 8 and 9).

Claim 13 is directed to a computer system comprising “a bus; a processor coupled to the bus; [and] a system control agent [(claim 11)], coupled to the bus....” (See Application page 7 line 1 - page 9 line 23 and Figure 2).

Claim 15 is directed to a graphical user interface (GUI) used to display a “first set of entertainment system data corresponding to a first entertainment system selection [The Fugitive in our example], an identifier corresponding to the first set of entertainment system data of the first entertainment selection [Harrison Ford in our example], being selectable to cause a query interface to execute instructions linked to the identifier that require a search to be performed in a data engine and to generate a synopsis box that displays a second set of entertainment system data of a second entertainment selection, [and] the second set of entertainment system data being related to the first set of entertainment system data [the listing of movies being broadcast starring Harrison Ford as shown in Figure 8].” (See Application page15 line 21 - page 17 line 12).

Claim 28 is directed to a method with recitations similar to those of claim 1.

#### **VI. ISSUES PRESENTED**

Whether claims 1, 6, 11, 13, 15, and 28 are not supported by the specification.

Whether claims 1-10 and 15-33 are unpatentable under 35 U.S.C. 103(a) over Dunn (US 5,945,987).

Whether claims 11-14 are unpatentable under 35 U.S.C. 103(a) over Williams et al (US 6,157,411).

#### **VII. GROUPING OF CLAIMS**

For the purposes of this appeal, claims 1-10, 15-23, and 26--33 stand or fall together, claims 24 and 25 stand or fall together, and claims 11-14 stand or fall together.

## **VIII. ARGUMENT**

### **A. OBJECTION TO THE AMENDMENT TO CLAIMS 1, 6, 11, 13, 15, AND 28 IS IMPROPER BECAUSE THE ADDED MATERIAL IS SUPPORTED BY THE ORIGINAL DISCLOSURE**

The Examiner has objected to the amendment filed on 04/03/02 under 35 U.S.C. § 132 as introducing new matter into the disclosure. The added matter which the Examiner objected to was as follows: Claim 1, 6, and 28 “accessing instructions linked to the selectable identifier” and claims 11, 13, and 15 “the query interface to execute instructions linked to the identifier that require a search to be performed in the data engine.” Because the amendment was to the claims and not to the specification, Appellant suggests that the Examiner intended to reject these claims based on 35 U.S.C. § 112, first paragraph as containing subject matter which is not described in the specification. Appellants respectfully assert that the amendments are supported by the specification.

The amendments made to the claims were based on material in the specification that would be understood by a person of average skill in the art that Appellant had possession of the claimed invention. Specifically, the specification states

The first entertainment system data may include *a data portion that includes instructions to be executed* by the query interface 313. *These instructions may include instructions* for the query interface to retrieve additional entertainment system data, ... *perform a search in the database*..., or other instructions.  
(emphasis added)

(See Application, page 13, lines 16-22). The Application further discloses:

When selected [the selectable identifier], **the query interface 313** performs the instructions stored in the data portion... The instructions may, for example, direct the query interface 313 to search the data base 320...

(See Application, page 15, lines 3-6). Similar support can also be found on page 14, lines 20-24, and page 15, lines 12-15.

As stated on page 15, lines 3-6, after the selectable identifier is selected, the query interface performs instructions stored in the data portion. Since the instructions are stored in the data portion, the instructions must be accessed. Additionally, because the instructions are performed after the selectable identifier is selected, there must necessarily be a link or connection from the instructions to the selectable identifier. Finally, the specification states on page 13, lines 16-22, that these instructions may include instructions to perform a search in the database. Therefore, a person of average skill in the art would understand that there is support in the specification for “accessing instructions linked to the selectable identifier” and “the query interface to execute instructions linked to the identifier that require a search to be performed in the data engine.” Appellants respectfully request the withdrawal of the objection under 35 U.S.C. § 132.

**B. REJECTION OF CLAIMS 1-10, 15-23, AND 26-33 UNDER 35 USC §103(a)  
IS IMPROPER BECAUSE DUNN FAILS TO TEACH OR SUGGEST  
“PERFORMING A SEARCH BASED ON THE ACCESSED  
INSTRUCTIONS FOR A SECOND ENTERTAINMENT SELECTION  
HAVING A CORRESPONDING SECOND SET OF ENTERTAINMENT  
SYSTEM DATA RELATED TO THE FIRST SET OF ENTERTAINMENT  
SYSTEM DATA” WHEN A SELECTABLE IDENTIFIER IS SELECTED.**

The Examiner has rejected claims 1-10, 15-23, and 26-33 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,945,987 of Dunn et al. (“Dunn”). On independent claim 1, the Examiner and Applicants agree that Youman does not explicitly teach “performing a search based on the accessed instructions for a second entertainment selection having a corresponding second set of entertainment system data related to the first set of entertainment system data when a selectable identifier is

selected.” However, the Examiner asserts that to implement the performance of a search for a second selection corresponding to the first selection would have been obvious because it was well known in the art for a user to select a movie and then have a second selection by the same actor displayed. Applicants respectfully disagree.

Dunn teaches a video-on-demand application that allows a user to group programs into manageable criteria (col. 2, lines 23-29). After the programs are grouped, preview trailers for the programs are displayed (col. 2, lines 28-29). The criteria is preferably presented as scrollable lists which the viewer manipulates to select a certain criteria (col. 3, lines 4-6). In one implementation, a star list and a title list are presented simultaneously (col. 3, lines 6-7). Upon selection of a star, a second list of movie titles in which the actor appears is displayed in the title list (col. 3, lines 8-10). The second list is an example of a manageable set of related video programs from which a user can choose a program to view (col. 3, lines 10-12).

The list of actors has nothing to do with any particular show. Dunn’s scrollable list is merely a list of all values for the corresponding field in a SQL database. For example, the actor list is a list of all actors in the database (see col. 8, lines 55-56). Unlike claim 1, this list does not “present a selectable identifier corresponding to the first set of entertainment data.” Indeed, there is not even a first entertainment selection in which a selectable identifier could correspond to.

After the user makes a selection in the first list, the second list merely corresponds to movies that meet the specified criteria (see col. 8, lines 43-46). For example, the movies displayed in the second list are all the movies in the database that star the selected actor. Dunn does not perform “a search based on the accessed instructions for a second entertainment selection having a corresponding second set of entertainment system data related to the first set of entertainment data.” Although Dunn searches for an actor, there

is no first entertainment selection from which a second entertainment selection can be found.

The Examiner has the burden of establishing a *prima facie* case of obviousness. The Examiner has failed to show any suggestion or motivation in the cited reference that makes the present invention obvious. However, an obviousness determination must be made in view of the whole invention, “including whether the prior art provides any teaching or suggestion to one of ordinary skill in the art to make the changes that would produce the patentee’s … device,” including what could be characterized as simple changes. *In re Chu*, 66 F.3d 292, 298 (Fed. Cir. 1995), citing *In re Gordon*, 733 F.2d 900, 902 (Fed. Cir. 1984) (Although a prior art device could have been turned upside down, that did not make the modification obvious unless the prior art fairly suggested the desirability of turning the device upside down).

As previously discussed, Dunn does not teach or suggest “performing a search based on the accessed instructions for a second entertainment selection having a corresponding second set of entertainment system data related to the first set of entertainment system data.” What’s more, the Examiner’s statement that such a search would have been obvious because it was well known in the art for a user to select a movie and then have a second selection by the same actor displayed is not the required “convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references.” *Ex parte Clapp*, 227 U.S.P.Q. 972.

On the basis of the above arguments, it is respectfully submitted that the Examiner’s rejection of Claim 1 under 35 U.S.C § 103(a) is improper. Appellant respectfully requests that the rejection be reversed. Claims 15 and 28 contains recitations similar to those discussed above and are believed to be allowable therefor. The

remaining rejected claims are dependent on one of claims 1, 15 or 28 and are believed to be allowable therefor as well as for the recitations independently set forth therein.

**C. REJECTION OF CLAIMS 24 AND 25 UNDER 35 USC §103(a) IS IMPROPER BECAUSE DUNN DOES NOT TEACH OR SUGGEST A DATA PARSER OR A QUERY INTERFACE TO DISPLAY A SECOND ENTERTAINMENT SELECTION HAVING A CORRESPONDING SECOND SET OF ENTERTAINMENT SYSTEM DATA RELATED TO THE FIRST SET OF ENTERTAINMENT SYSTEM DATA.”**

The Examiner has rejected claims 24 and 25 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,945,987 of Dunn (“Dunn”). Claims 24 and 25 depend directly or indirectly on claim 11. Dunn does not teach or suggest, nor does the Examiner state that Dunn teaches or suggests, “a data parser that formats entertainment system data into an identifier portion and a data portion”.

Additionally, Dunn does not teach or suggest a query interface to “display a second entertainment selection, resulting from the search, having a corresponding second set of entertainment system data related to the first set of entertainment system data.” As previously discussed, Dunn does not have a first set of entertainment system data from which a second set of entertainment data can be found. Accordingly, the reference cannot render obvious Applicants’ invention as claimed in claims 24 and 24, and Applicants respectfully request the withdrawal of the rejection of the claims under 35 U.S.C. §103(a) over Dunn.

**D. REJECTION OF CLAIMS 11-14 UNDER 35 USC §103(a) IS IMPROPER BECAUSE WILLIAMS DOES NOT TEACH OR SUGGEST A QUERY INTERFACE TO DISPLAY A SECOND ENTERTAINMENT SELECTION**

**HAVING A CORRESPONDING SECOND SET OF ENTERTAINMENT  
SYSTEM DATA RELATED TO THE FIRST SET OF ENTERTAINMENT  
SYSTEM DATA.”**

The Examiner has rejected claims 11-14 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,157,411 of Williams et al. (“Williams”). The Examiner states, and Appellants agree, that Williams does not teach “an identifier corresponding to a first set of entertainment system data of a first entertainment selection, the identifier being selectable to ... display a second entertainment selection, resulting from the search, having a corresponding second set of entertainment system data related to the first set of entertainment system data.” However, the Examiner asserts that these recitations of claim 11 would have been obvious because it would allow a user to display program schedule information in an overlaying relationship with a television program appearing on one of the selected plurality of channels on the television. While the Examiner asserts that these recitations are obvious, there is no suggestion of providing such features in the cited references.

Williams teaches a method and apparatus for compiling a repository of entertainment system data from multiple sources (col. 1, lines 61-62). There is no teaching or suggestion of a selectable identifier to display a second entertainment selection, resulting from a search, having a corresponding second set of entertainment system data related to the first set of entertainment system data. The only support for the Examiner’s argument that such a modification would be obvious is that it would allow a user to do exactly what is claimed in claims 11 and 13. This is a circular argument that cannot be used to support a *prima facie* case of obviousness.

The Examiner has failed to present “a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the

teachings of the references,” as provided for in *Ex parte Clapp*, 227 U.S.P.Q. 972. The Examiner has also failed to meet the standard set forth in *In re Dembiczkak*, 175 F.3d 994 (Fed. Cir. 1999), that a “showing of a suggestion or motivation must be clear and particular.” Accordingly, the reference cannot render obvious Applicants’ invention as claimed claim 11-14, and Applicants respectfully request the withdrawal of the rejections of the claim under 35 U.S.C. §103(a) over Williams.

## VII. CONCLUSION

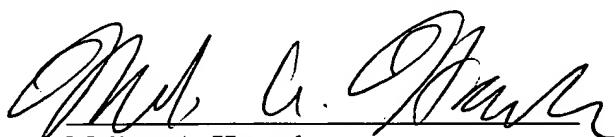
Appellant respectfully submits that all the appealed claims in this application are patentable and requests that the Board of Patent Appeals and Interferences overrule the Examiner and direct allowance of the rejected claims.

This brief is submitted in triplicate, along with a check for \$300.00 to cover the appeal fee for one other than a small entity as specified in 37 C.F.R. § 1.17(c). Please charge any shortages and credit any overpayment to out Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

Date: 10/2/02



Melissa A. Haapala  
Attorney for Appellant  
Registration Number: 47,622

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, CA 90025-1026  
(303)-740-1980

**APPENDIX OF CLAIMS (37 C.F.R. § 1.192(c)(7))**

- 1        1. A method for managing entertainment system data, comprising:
  - 2           obtaining a record corresponding to a first entertainment selection;
  - 3           presenting a first set of entertainment system data in the obtained record
  - 4           corresponding to the first entertainment selection on a display device;
  - 5           presenting a selectable identifier corresponding to the first set of entertainment
  - 6           system data on the display device;
  - 7           receiving a selection of the selectable identifier;
  - 8           accessing instructions linked to the selectable identifier;
  - 9           performing a search based on the accessed instructions for a second entertainment<sup>5</sup>
  - 10          selection having a corresponding second set of entertainment system data related to the
  - 11          first set of entertainment system data; and
  - 12          presenting a result of the search on the display device.
- 1        2. The method of Claim 1, wherein obtaining the record comprises
  - 2           referencing an entertainment selection identifier of the first entertainment selection in a
  - 3           database.
- 1        3. The method of Claim 1, wherein presenting the selectable identifier
  - 2           comprises generating an identifier that is distinguishable from non-selectable text.
- 1        4. The method of Claim 1, wherein performing the search comprises
  - 2           searching a database for the entertainment system data related to the first set of
  - 3           entertainment system data.

1           5.     The method of Claim 1, wherein presenting the result of the search  
2     comprises displaying the result of the search in a synopsis box on the display device.

1           6.     A computer-readable medium having stored thereon a sequence of  
2     instructions, the sequence of instructions including instructions which, when executed by  
3     a processor, causes the processor to perform operations comprising:  
4                 obtaining a record corresponding to a first entertainment selection;  
5                 presenting a first set of entertainment system data in the obtained record  
6     corresponding to the first entertainment selection on a display device;  
7                 presenting a selectable identifier corresponding to the first set of entertainment  
8     system data on the display device;  
9                 receiving a selection of the selectable identifier;  
10                accessing instructions linked to the selectable identifier;  
11                performing a search based on the accessed instructions for a second entertainment  
12     selection having a corresponding second set of entertainment system data related to the  
13     first set of entertainment system data; and  
14                presenting a result of the search on the display device.

1           7.     The computer-readable medium of Claim 6, wherein obtaining the record  
2     comprises referencing an entertainment selection identifier of the first entertainment  
3     selection in a database.

1        8.     The computer-readable medium of Claim 6, wherein presenting the  
2     selectable identifier comprises generating an identifier that is distinguishable from non-  
3     selectable text.

1        9.     The computer-readable medium of Claim 6, wherein performing the  
2     search comprises searching a database for entertainment system data related to the first  
3     set of entertainment system data.

1        10.    The computer-readable medium of Claim 6, wherein presenting the result  
2     of the search comprises displaying the result of the search in a synopsis box on the  
3     display device.

1        11.    A system control agent, comprising:  
2              a data parser that formats entertainment system data into an identifier portion and  
3              a data portion;  
4              a data engine, coupled to the data parser, that stores the entertainment system data  
5              into a database according to corresponding entertainment selections; and  
6              a query interface, coupled to the database, that configures a graphical user  
7              interface (GUI) having an identifier corresponding to a first set of entertainment system  
8              data of a first entertainment selection, the identifier being selectable to cause the query  
9              interface to execute instructions linked to the identifier that require a search to be  
10          performed in the data engine and to display a second entertainment selection, resulting  
11          from the search, having a corresponding second set of entertainment system data related  
12          to the first set of entertainment system data.

1           12.     The system control agent of Claim 11, wherein the query interface  
2     comprises:

3                 a user interface unit that receives an identity of the identifier selected;  
4                 a database interface unit, coupled to the user interface, that searches the database  
5     for the second entertainment selection having the corresponding second set of  
6     entertainment system data related to the first set of entertainment system data; and  
7                 a synopsis box building unit, coupled to the database interface unit, that displays  
8     the identity of the second entertainment selection on a display device.

1           13.     A computer system, comprising:

2                 a bus;  
3                 a processor coupled to the bus;  
4                 a system control agent, coupled to the bus, that includes a data parser that formats  
5     entertainment system data into an identifier portion and a data portion, a data engine that  
6     stores the entertainment system data into a database according to corresponding  
7     entertainment selections, a query interface that configures a graphical user interface  
8     (GUI) having an identifier corresponding to a first set of entertainment system data of a  
9     first entertainment selection, the identifier being selectable to cause the query interface to  
10    execute instructions linked to the identifier that require a search to be performed in the  
11    data engine and to display a second entertainment selection, resulting from the search,  
12    having a corresponding second set of entertainment system data related to the first set of  
13    entertainment system data.

1           14.     The computer system of Claim 13, wherein the query interface comprises:  
2               a user interface unit that receives an identity of the identifier selected;  
3               a database interface unit, coupled to the user interface, that searches the database  
4               for the second entertainment selection having the corresponding second set of  
5               entertainment system data related to the first set of entertainment system data; and  
6               a synopsis box building unit, coupled to the database interface unit, that displays  
7               the identity of the second entertainment selection on a display device.

1           15.     A graphical user interface (GUI), comprising:  
2               a first set of entertainment system data corresponding to a first entertainment  
3               system selection;  
4               an identifier corresponding to the first set of entertainment system data of the first  
5               entertainment selection, the identifier being selectable to cause a query interface to  
6               execute instructions linked to the identifier that require a search to be performed in a data  
7               engine and to generate a synopsis box that displays a second set of entertainment system  
8               data of a second entertainment selection, resulting from the search, the second set of  
9               entertainment system data being related to the first set of entertainment system data.

1           16.     The method of Claim 1, wherein performing the search comprises  
2               performing a search of records of entertainment system data received from a plurality of  
3               different sources.

1           17. The method of Claim 1, wherein the entertainment selections are selected  
2 from the group comprising programs, music selections, software applications, files, and  
3 Internet broadcasts.

1           18. The method of Claim 1, wherein performing the search comprises  
2 performing a search in accordance with instructions stored with the first set of  
3 entertainment system data to find other entertainment selections.

1           19. The method of Claim 1, wherein the second set of entertainment data is  
2 related to the first set of entertainment data in that an item of data corresponding to the  
3 same trait is the same in both sets of data.

1           20. The computer-readable medium of Claim 6, wherein performing the  
2 search comprises performing a search of records of entertainment system data received  
3 from a plurality of different sources.

1           21. The computer-readable medium of Claim 6, wherein the entertainment  
2 selections are selected from the group comprising programs, music selections, software  
3 applications, files, and Internet broadcasts.

1           22. The computer-readable medium of Claim 6, wherein performing the  
2 search comprises performing a search in accordance with instructions stored with the first  
3 set of entertainment system data to find other entertainment selections.

1           23. The computer-readable medium of Claim 6, wherein the second set of  
2 entertainment data is related to the first set of entertainment data in that an item of data  
3 corresponding to the same trait is the same in both sets of data.

1           24. The system control agent of Claim 11, wherein the entertainment system  
2 data is received from a plurality of different sources.

1           25. The system control agent of Claim 12, wherein the database interface unit  
2 searches the database in accordance with instructions that it retrieves from storage with  
3 the first set of entertainment system data.

1           26. The GUI of Claim 15, further comprising non-selectable text  
2 corresponding to entertainment system data of the first entertainment selection.

1           27. The GUI of Claim 26, wherein the selectable identifier is presented so that  
2 it is distinguishable from non-selectable text.

1           28. A method comprising:  
2           obtaining a record at an entertainment system, the record containing descriptive  
3 data describing a first program;  
4           presenting the descriptive data on a display device of the entertainment system;  
5           presenting a selectable identifier on the display device, the selectable identifier  
6 corresponding to the descriptive data;  
7           receiving a selection of the selectable identifier;  
8           accessing instructions linked to the selectable identifier;

9                performing a search of records of the entertainment system based on the accessed  
10      instructions to identify a second program having descriptive data that is related to the  
11      descriptive data of the first program; and  
12                presenting a result of the search on the display device.

1                29.        The method of Claim 28, wherein presenting the selectable identifier  
2      comprises generating an identifier that is distinguishable from non-selectable text.

1                30.        The method of Claim 28, wherein performing the search comprises  
2      searching a database of records for programs, the records having identifiers and a data  
3      portion for each identifier, the data portion containing the descriptive data.

1                31.        The method of Claim 30, wherein performing the search comprises  
2      performing a search of records of data received from a plurality of different sources.

1                32.        The method of Claim 28, wherein performing the search comprises  
2      performing a search in accordance with instructions stored with the first set of descriptive  
3      data to find other programs.

1                33.        The method of Claim 28, wherein the descriptive data of the second  
2      program is related to the descriptive data of the first program in that an item of data is the  
3      same in both.

4